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**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA**

DAKOTAH MASSIE and NEIL MANGLANI,  
individually and on behalf of all others similarly  
situated,

Plaintiffs,

v.

GENERAL MOTORS COMPANY and  
DECIBEL INSIGHT, INC.,

Defendants.

CASE NO.: 1:20-CV-01560-NONE-JLT

**STIPULATION AND [PROPOSED] ORDER  
TO EXTEND DEFENDANT DECIBEL  
INSIGHT, INC.'S TIME TO RESPOND TO  
CLASS ACTION COMPLAINT BY 60 DAYS  
(Doc. 6)**

Pursuant to Fed. R. Civ. P. 6(b)(1) and Local Rule 144(a), Plaintiffs Dakota Massie and Neil Manglani (“Plaintiffs”) and Defendant Decibel Insight, Inc. (“Decibel”) (collectively, the “Parties”), by and through their respective counsel, respectfully request that the court approve the Parties’ stipulation to extend the time for Decibel to respond to the Class Action Complaint (“Complaint”) by 60 days until Monday, February 1, 2021.

WHEREAS, Plaintiffs filed the Complaint on November 4, 2020, ECF No.1, alleging violations of the California Invasion of Privacy Act, Cal. Penal Code §§ 631 and 635, and invasion of privacy under California’s Constitution;

WHEREAS, Plaintiffs served Decibel with a copy of the Complaint on November 10, 2020;

WHEREAS, Decibel’s current deadline to respond to the Complaint is December 1, 2020;

WHEREAS, counsel for Decibel seeks additional time to investigate the factual and legal issues raised by Plaintiffs in the Complaint prior to filing a responsive pleading;

WHEREAS, counsel for the Parties conferred on November 20, 2020 and determined that it would serve the interests of efficiency to extend Decibel’s response date 60 days to allow the Parties additional time to investigate their respective claims and defenses and explore resolutions that may minimize or obviate the need for motion practice;

WHEREAS, no extensions have previously been sought by the Parties;

WHEREAS, no party will be prejudiced by an extension of Decibel’s time to respond to the Complaint;

WHEREFORE, IT IS HEREBY STIPULATED between Plaintiffs and Decibel that:

Decibel’s deadline to file an answer or otherwise respond to the Complaint is extended up to and including February 1, 2021.

The Parties respectfully request that this stipulation be granted by signing the accompanying proposed order.

DATED: November 24, 2020

BURSOR & FISHER, P.A.

By: /s/ L. Timothy Fisher

L. Timothy Fisher

Joel D. Smith

Attorneys for plaintiffs DAKOTA MASSIE and  
NEIL MANGLANI

DATED: November 24, 2020

GREENBERG TRAURIG, LLP

By: /s/ Ian Ballon

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Attorneys for defendant DECIBEL INSIGHT, INC.

**[PROPOSED] ORDER**

Based upon the stipulation of the parties, the Court **ORDERS** that Decibel Insight, Inc. SHALL  
respond to the Class Action Complaint no later than February 1, 2021.

IT IS SO ORDERED.

Dated: November 24, 2020

/s/ Jennifer L. Thurston  
UNITED STATES MAGISTRATE JUDGE

**CERTIFICATE OF SERVICE**

I hereby certify that on November 24, 2020, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF, which will deliver the document to all counsel of record.

/s/ L. Timothy Fisher

L. Timothy Fisher